Andrew G. Patel Attorney-at-Law 15 Chester Avenue White Plains, New York 10601 apatel@apatellaw.com

Telephone 212-349-0230

By Email and ECF

May 31, 2023

REQUEST GRANTED AS TO ALL DEFENDANTS.

The Status Conference previously set for June 8, 2023 is rescheduled to July 13, 2023 at 12:00PM in Courtroom 15C at the 500 Pearl Street Courthouse. On consent of all parties, the Court excludes time from June 1, 2023 until July 13, 2023 pursuant to the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), upon a finding that the interest of justice outweighs the interest of the public and the defendants in a speedy trial.

The Honorable Lewis J. Liman United States District Judge United States Courthouse 500 Pearl Street New York, NY 10007

6/1/2023 so ordered.

LEWIS J. LIMAN United States District Judge

Re: <u>U.S. v. Perez; et al, including Sean Smith</u>

23 Cr. 99 (LJL)

Dear Judge Liman:

This letter is respectfully submitted to request that the conference currently scheduled for June 8, 2023, be adjourned to July 13, 2023 after 11:00AM if that date and time is convenient to Your Honor.

I make this request because defense counsel have not yet received, much less had the opportunity to review, sufficient discovery material for a meaningful conference on June 8th. When working with a CDA, discovery production is a multistep process. The Government produces the discovery to the CDA, which has not been seamless in this case. The CDA is currently working on the material for production to defense counsel. The huge upside of working with a CDA is that once defense counsel receives the discovery, the review process is both more complete and faster than if we did not have the benefit of the CDA's work.

Assistant United States Attorney Ni Qian has informed me that the Government consents to this request. On behalf of all defense counsel, I consent to the exclusion of time until July 14, 2023 for Speedy Trial purposes.

Respectfully submitted,

/s/Andrew Patel
Andrew Patel
Counsel for Sean Smith

cc: All counsel by ECF